

Hon. Ronald B. Leighton

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

NEIDINGER, KRISTINE M.,) NO. C10-5702-RBL
)
Plaintiff,) DECLARATION OF CHRISTOPHER
) TAYLOR IN SUPPORT OF PLAINTIFF'S
v.) RESPONSE TO DEFENDANTS' MOTION
) FOR SUMMARY JUDGMENT
COUNTY OF PIERCE, et al.,)
)
Defendants.)
)

I, CHRISTOPHER TAYLOR, declare:

1. I am the attorney representing the plaintiff the above-captioned matter.
2. Attached as Exhibit A are true and correct copies of excerpts from Plaintiff's First Discovery Request to Defendant County of Pierce and Responses Thereto dated February 23, 2011.
3. Attached as Exhibit B are true and correct copies of excerpts and exhibits from Kristine Neidinger's Deposition taken on August 8th and 9th, 2011.
4. Attached as Exhibit C are true and correct copies of excerpts from Richard Malidore's Deposition taken on September 12th, 2011.
5. Attached as Exhibit D are true and correct copies of excerpts from Elizabeth Earp's Deposition taken on September 14th, 2011.

6. Attached as Exhibit E are true and correct copies of excerpts and exhibits from Ernest Burwell's Deposition taken on September 22nd, 2011.

I declare under penalty of perjury of the laws of the State of Washington the foregoing is true and correct.

DATED this 10th day of June, 2012 at Olympia, Washington.

/s/ Christopher Taylor
Christopher Taylor

CERTIFICATE OF SERVICE

I certify that on June 11, 2011, I unsuccessfully attempted to file, and on July 12, 2012 I successfully electronically filed, the foregoing DECLARATION OF CHRISTOPHER TAYLOR IN SUPPORT OF PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT, with attachments, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- Michelle Luna-Green, Attorney for Defendants: mluna@co.pierce.wa.us

/s/ Christopher Taylor
Christopher Taylor